

**FILED**

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CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

BY                      DEPUTY CLERK

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U.S. DISTRICT COURT

EASTERN DIVISION

ROBERT AMATRONE, NICK AMATRONE, MARLA  
SHARLOW

Case No.: [Number]

**2:15 - CV - 0616 KJM CKD PS**

Plaintiff,

vs.

Randy Champion, State Farm Fire and Casualty  
Company, Nationwide Mutual Automobile, Devin Bell,  
Contra Costa County District Attorney office, Contra  
Costa County Fire Protection District, Contra Costa  
Sheriff, Contra Costa County Superior Court, San Ramon  
Valley Fire District, State of California Department of  
Insurance, does 1-50

COMPLAINT FOR UNLAWFUL SEARCH AND  
SEIZURE  
FRAUD, DEFAMATION OF CHARACTER  
FALSIFY EVIDENCE AND DOCUMENTS  
PLANTING EVIDENCE  
STAGING EVIDENCE  
EMOTIONAL DISTRESS  
ASSAULT OF A DISABLED PERSON  
UNLAWFUL FORCED ENTRY  
VIOLATING THE KNOCK RULE  
UNLAWFUL BREAKING AND ENTERING  
UNLAWFUL ENTRY INTO A TENANTS ROOM

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UNLAWFUL ENTRY INTO A TENANTS ROOM

UNLAWFUL DETAINMENT

UNLAWFUL SEIZURE OF PROPERTY

DESTRUCTION OF PROPERTY

FALSE IMPRISONMENT

MALICE

VIOLATION OF HIPPA ACT

VIOLATION OF PRIVACY ACT

HARRASSMENT

VIOLATION OF THE FIRST, FORTH, SIXTH AND FOURTEENTH AMENDMENTS

THEFT OF PERSONAL PROPERTY

DESTRUTION OF PERSONAL PROPERTY

COERCION

CRIMINAL TRESPASS

ET AL - 1

Defendant

UNLAWFUL DETAINMENT  
 UNLAWFUL SEIZURE OF PROPERTY  
 DESTRUCTION OF PROPERTY  
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 VIOLATION OF PRIVACY ACT  
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 ET AL

On or March 24<sup>th</sup>, 2014 a search warrant was issued by a Superior Court Judge at the request of Randy Champion on the basis of investigating a Rolex watch and a defective watch winder purchased from Estate Consignments and subsequently returned to the store for an estimate of repair and information of the owner and manufacturer. The first line of defense Randy Champion was a personal friend of the store owner and had purchased many items from the store, and entered into negotiations of many of the items in the store for his personal

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1 use. With lack of cooperation from the consignment store, American Express Corporation suspended the transaction  
 2 from the stores American Express receipts, allowing them 30 days to respond. Randy Champion was called by the  
 3 owner as a personal favor to assist in writing a letter to American Express to uphold the charge. Randy Champion  
 4 requested a search warrant from the superior court for a fishing as to the damage to the watch and winder. This is a  
 5 clear violation as he may not use a civil case to obtain a search warrant and assist an acquaintance. He should have  
 6 clearly removed himself as this was a conflict of interest. *People v. Superior Court (Bauman & Rose)* (1995) 37  
 7 Cal. App. 4<sup>th</sup> 1757 [4 Cal. Rptr. 2d 734] and *Geilim v. Superior Court* ((1991) 234 Cal. App. 3d 166 [285 Cal Rptr.  
 8 602]. Both cases arose after a search warrant was issued pursuant to the provisions of Penal code Section 1524,  
 9 subdivision (C) and client files were seized from attorneys' offices on the basis of probable cause to establish  
 10 insurance fraud. Both cases concluded that the showing of probable cause to issue a search warrant did not rise to  
 11 the level of prima facie showing to establish the crime/fraud exception. They each concluded that a further in  
 12 camera hearing was appropriate to determine whether a prima facie showing existed to apply the exception.

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1 In this situation, many files seized, along with computers and other equipment where privileged materials  
 2 are normally kept. The files relating to Nick Amatrone's insurance claim with State Farm were swept up in the  
 3 search teams broad net. These files and electronic items contained attorney client information regarding Nick  
 4 Amatrone's claim with State Farm. He had a hearing with a Contra Costa Superior Court with Judge Burch  
 5 regarding the return of these items. The judge granted the request but the items were never returned.

6 With faulty search warrant in hand, the search team yelled Sheriff's department and broke in the  
 7 front door at 228 Stone Valley Way. Twenty Contra Sheriff officer's armed with hand guns and assault rifles came  
 8 in through the broken door. They pointed guns at Marla Sharlow and her son and the family dogs, and Champion  
 9 threw a soaking wet search warrant at Marla Sharlow's face while her hands were in the air with guns pointed at her.  
 10 She was not allowed to read it and when it was finally picked up it was illegible. They immediately ripped the wires  
 11 from the video surveillance system and motioned in another unmarked car from the hillside. This person proceeded  
 12 to carry in boxes containing Rolex watches and other plant evidence that was used for staging and photographing  
 13 different scenarios. Even a jewelry case from Marla Sharlow's room was carried into Nick's room and dumped on

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1 velvet blanket on top of his desk scattering the jewelry everywhere. More was dumped in the master bathroom on  
 2 the vanity and down the drain. The house was turned upside down, mud tracked in all over the white carpet and the  
 3 garage turned upside down, boxes dumped. There was staging of various items done on the white fireplace hearth  
 4 with boxes of plant evidence brought onto the property. A water and graphite mixture was spray onto these items to  
 5 leave an outline of these items on the hearth. A video back up system recorded their movements throughout  
 6 supporting the illegal activities that were done by the various agencies.

7           The attempted to violate Marla Sharlow's civil rights by lying to her, leading her to make false  
 8 statements, threatening her with arrest and loss of custody of her son. They coerced her into leaving the property so  
 9 they could continue to plant evidence, by lying not being arrested if she cooperated and turned against her husband.  
 10 They took her into the police department and lead her into answers to questions that were incriminating and  
 11 proceeded to turn on and off the tape recorder as it suited them. They spit in her face, screamed at her and threaten  
 12 her with her job. The force her into an emotional breakdown as they had obtained confidential medical records from  
 13 Nationwide regarding medical leave for anxiety and stress and knew she could be manipulated.

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1 Several attempts to overturn the search warrant were passed off from judge to judge in the Contra  
 2 Costa Superior Court as they were unfamiliar with the terminology as was the district attorney. However, with the  
 3 filings with the Contra Costa County district court, affidavits from tenants and acquaintances, we taken by the  
 4 investigators and use to threaten these individuals, while defaming the reputation and character of  
 5 Robert Amatrone to these individuals. They were lied to, coerced, threaten to change their testimony despite their  
 6 sworn statements. And they are all willing to testify in court despite these threats from these individuals regarding  
 7 the lies about Robert Amatrone and his family and also about the corruption of the government agencies.

8 The names of the various individuals have been withheld from us, however, once it is determined  
 9 who they were, they will be named in the suit.

10 We have filed claims for damages with each of the agencies involved as required and they have all  
 11 been rejected including the State of California Department of insurance as necessary to move forward with our  
 12 federal lawsuit.

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We are seeking remedy of damages of \$250,000,000.00 million dollars in damages from the various agencies, for personal injury, defamation, mental trauma, financial, emotional distress, medical, property damage, etc. We request a jury trial to resolve the issues and punitive damages.

Dated this 18 of March, 2015.

  
Robert Amatrone

  
Nicholas Amatrone

  
Marla Sharlow

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